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13		N DAGEDAGE GOALDE
14		S DISTRICT COURT
15	DISTRICT	OF NEVADA
16	EDWARD CALVILLO,	Case No. 2:19-CV-00277-RFB-NJK
17		
18	Plaintiff,	DEFENDANT EXPERIAN INFORMATION SOLUTIONS, INC.'S
19	V.	MOTION TO EXTEND TIME TO FILE REPLY IN SUPPORT OF MOTION TO
20	EXPERIAN INFORMATION SOLUTIONS, INC.; and TRANS UNION, LLC,	STAY DISCOVERY AND MOTION FOR PROTECTIVE ORDER
21	Defendants.	[FIRST REQUEST]
22		Complaint filed: February 14, 2019
23		FAC filed: April 16, 2019
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DEFENDANT EXPERIAN INFORMATION SOLUTIONS, INC.'S MOTION TO EXTEND TIME TO FILE REPLY IN SUPPORT OF MOTION TO STAY DISCOVERY AND MOTION FOR PROTECTIVE ORDER

Defendant Experian Information Solutions, Inc. ("Experian"), by and through its counsel of record, hereby moves for a one-day extension to file its reply in support of its Motion to Stay Discovery and Motion for Protective Order, which was filed on May 3, 2019. (ECF No. 28). Currently, Experian's reply is due May 28, 2019, the day after Memorial Day weekend. Pursuant to LR IA 6-1, Experian respectfully requests a one-day extension or until May 29, 2019, in light of the holiday weekend and previously scheduled family plans. There is no hearing currently set.

DATED this 21st day of May 2019.

NAYLOR & BRASTER

By: /s/ Jennifer L. Braster

Jennifer L. Braster Nevada Bar No. 9982 Andrew J. Sharples Nevada Bar No. 12866 1050 Indigo Drive, Suite 200 Las Vegas, NV 89145

Cheryl L. O'Connor Nevada Bar No. 14745 JONES DAY 3161 Michelson Drive, Suite 800 Irvine, CA 92612-4408

Attorneys for Defendant Experian Information Solutions, Inc.

MEMORANDUM OF POINTS AND AUTHORITIES

On May 3, 2019, Experian filed its Motion to Stay Discovery and Motion for Protective Order. (ECF No. 28). Pursuant to this Court's order, Plaintiff's response was due May 7, 2019. Plaintiff erroneously calendared the response deadline and did not file a response on May 7, 2019 (or thereafter). On May 17, 2019, Plaintiff's counsel met and conferred with Experian's undersigned counsel regarding Plaintiff's miscalendaring and requested an extension to file his response brief. (ECF Nos. 34, 35, 36). In light of the Court's order regarding the briefing schedule for discovery motions, Experian could not stipulate to Plaintiff filing a belated response. (*Id.*). That decision is within the province of the Court. Experian did agree that it would not oppose Plaintiff's motion to extend the response deadline, and Plaintiff filed that motion to extend on May 17, 2019. (ECF Nos. 34, 35, and 36).

On May 20, 2019, the Court granted Plaintiff's (unopposed) motion to extend the response deadline. (ECF No. 38). Plaintiff's response is now due May 24, 2019. (*Id.*). As a result, Experian's reply in support of its Motion to Stay Discovery and Motion for Protective Order is now due May 28, 2019, or the day after Memorial Day weekend.

Due to the holiday weekend and the undersigned counsel's previously scheduled family plans, Experian respectfully requests a modest one-day extension or until May 29, 2019 to file its reply brief. (Declaration of Jennifer L. Braster at ¶ 4). Experian's counsel conferred with Plaintiff's counsel, Matthew Knepper, who stated he had no opposition to this one-day extension. (*Id.* at ¶ 5). There will be no prejudice to the parties as a result of this modest extension and a hearing has not yet been set. This deadline for Experian's reply brief stemmed from Plaintiff's calendaring error and requested extension, which Experian did not oppose. The undersigned counsel previously scheduled a family trip over the holiday weekend, not anticipating having a reply brief due in this

1	matter on May 28, 2019. As a result, Experian respectfully requests the Court grant this	
2	(unopposed) motion for a one-day extension to file its reply brief.	
3		
4	Naylor & Braster	
5		
6	By: /s/ Jennifer L. Braster	
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13	Attorneys for Defendant	
14	Experian Information Solutions, Inc.	
15	<u>ORDER</u>	
15 16	<u>ORDER</u>	
	ORDER IT IS SO ORDERED	
16	IT IS SO ORDERED	
16 17	IT IS SO ORDERED United States Magistrate Judge	
16 17 18	IT IS SO ORDERED	
16 17 18 19	IT IS SO ORDERED United States Magistrate Judge	
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